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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

JESSE CANTU, individually and on behalf of all
others similarly situated,

Plaintiff,

v.

WW.COM, LLC, a Delaware limited liability
company; WW INTERNATIONAL INC., a
Virginia corporation; and DOES 1 through 25,
inclusive,

Defendants.

Case No.: 2:22-cv-07977-MCS-JEM

**STIPULATION EXTENDING TIME TO
RESPOND TO COMPLAINT**

Complaint served: November 7, 2022
Current response date: December 28, 2022
New response date: January 13, 2023

STIPULATION REGARDING BRIEFING SCHEDULE

Plaintiff Jesse Cantu, individually and on behalf of all others similarly situated (“Plaintiff”), along with Defendants WW.com, LLC, and WW International, Inc. (“Defendants”) (together, the “Stipulating Parties”), hereby stipulate as follows:

STIPULATION

WHEREAS, on November 1, 2022, Plaintiff filed the Complaint in this action. ECF No. 1.

WHEREAS, Plaintiff served Defendants on November 7, 2022. ECF Nos. 9, 12.

WHEREAS, Defendants have each retained counsel only recently, on November 28, 2022.

WHEREAS, the parties have reached an agreement, subject to this Court’s approval, that Defendants’ time to answer or otherwise respond to the Complaint shall be extended to January 13, 2023, in order to give Defendants adequate time to investigate, analyze, and respond to the allegations in the complaint and, in the event of any contemplated motion to dismiss, to give the Stipulating Parties adequate time to hold a pre-motion conference pursuant to Civil L.R. 7-3.

WHEREAS, to ensure adequate time for the Court to consider and rule on the parties’ negotiated extension to January 13, 2023, the Stipulating Parties separately stipulated, pursuant to Civil L.R. 8-3, that Defendants’ time to answer or otherwise respond to the Complaint is extended by 30 days to December 28, 2022. ECF No. 14.

WHEREAS, the current responsive pleading deadline of December 28, 2022, falls between two federal holidays and during the end-of-year holiday period, during which counsel for the Defendants have previously planned and scheduled vacations. If Defendants file a contemplated motion to dismiss on the current December 28 deadline, the time period for counsel for Plaintiff to respond to the motion also would begin during the holiday period.

WHEREAS, the current responsive pleading deadline of December 28, 2022, would leave Defendants’ counsel inadequate time—only 30 days since being retained—to investigate, analyze, and respond to the allegations in the complaint and, in the event of any contemplated motion to dismiss, to prepare the motion and hold a pre-motion conference pursuant to Civil L.R. 7-3 at least 7 days prior to filing such a motion.

1 WHEREAS, the stipulated extension of Defendants' responsive pleading deadline to January 13,
2 2023, will not alter any dates already set by the Court.

3 THEREFORE, IT IS HEREBY STIPULATED AND AGREED:

4 The deadline for Defendants to answer, move, or otherwise respond to the complaint shall be
5 extended to and including January 13, 2023, subject to this Court's approval. A proposed Order has
6 been filed contemporaneously herewith.

7
8 **IT IS SO STIPULATED.**

9 DATED: December 5, 2022

COVINGTON & BURLING LLP

10 By: /s/ Neema Sahni
11 Neema Sahni
12 Attorneys for Defendants

13 DATED: December 5, 2022

PACIFIC TRIAL ATTORNEYS, APC

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15 By: /s/ Scott J. Ferrell
16 Scott J. Ferrell
17 Attorneys for Plaintiff

18 **ATTESTATION**

19 I, Neema Sahni, hereby attest, pursuant to Civ. L.R. 5-4.3.4, that concurrence to the content of
20 and filing of this document has been obtained from each signatory hereto.

21 DATED: December 5, 2022

22 By: /s/ Neema Sahni
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